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Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS

LI YING HUA, LI ZHENG ZHE and XU JING JI, ) CASE NO. CV 05-0019

Plaintiffs,

vs.

JUNG JIN CORPORATION, a CNMI corporation,  
ASIA ENTERPRISES, INC., a CNMI corporation,  
PARK HWA SUN and KIM HANG KWON,

Defendants.

EX PARTE MOTION UNDER LOCAL  
RULES 7.1.h.3(b) AND 7.1.h.5 FOR AN  
ORDER SHORTENING TIME FOR  
CONSIDERATION OF PLAINTIFFS'  
APPLICATION FOR APPROVAL OF  
SALE OF POKER MACHINES AND  
POKER RELATED EQUIPMENT

Date: none requested

Time: none requested

Judge: Hon. Alex R. Munson, Chief Judge

Plaintiffs, by and through their undersigned attorney of record, hereby file this Motion to Shorten Time, *ex parte*, pursuant to Fed R. Civ. P. 6(d) and Local Rule 7.1.h.5 for consideration of the Application of Plaintiffs for approval of the sale of Defendants' poker machines and poker related equipment pursuant to Fed. R. Civ. P. 69(a) and Title 7, Sections 4205 of the Commonwealth Code (2000).

CERTIFICATE PURSUANT TO LOCAL RULE 7.1.H.3(b)

1. I am the attorney for Plaintiffs in the above-captioned case. I submit this certificate pursuant to Local Rules 7.1.h.3(b). In support of this motion, Plaintiffs submit this Certificate of the undersigned.

1           2. On December 7, 2006, the Court issued an Amended Order in Aid of Judgment whereby  
2 the United States Marshal took into its custody all of the Defendants' poker machines and poker  
3 related equipment located on Lot Number 054 H 14 in Susupe, Saipan, Commonwealth of the  
4 Northern Mariana Islands (the "Susupe lot").

5           3. On December 22, 2006, the United States Marshal filed a Process Receipt and Return  
6 having completed the seizure of the real and personal property of Defendants directed by the Court's  
7 Amended Order in Aid of Judgment issued in this matter on December 7, 2006;

8           4. The Marshal relinquished custody of the seized items of personal property, including  
9 Defendants' poker machines and poker related equipment, to Plaintiffs' counsel pending further  
10 orders of this Court regard the disposition of such property to satisfy some or all of the judgment of  
11 Plaintiffs in this matter;

12           5. On December 28, 2007, the Court issued a Second Order in Aid of Judgment in the above-  
13 referenced case allowing the undersigned to sell Defendants' poker machines individually or in lots  
14 with court approval;

15           6. As discussed in the Application submitted herewith, after several months of marketing and  
16 negotiations with prospective purchasers, I have received what I believe is the highest and best price  
17 for Defendants' poker machines and poker related equipment;

18           7. The urgency of this request for approval is that the location of the poker machines and  
19 poker related equipment — the Susupe lot — was just sold to a third party pursuant to a public  
20 auction that occurred on May 5, 2007. The purchaser is taking possession of the Susupe lot today  
21 and the undersigned needs to secure Court approval of the sale of the poker machines so that their  
22 removal from the Susupe lot, if necessary, can be accomplished forthwith.  
23  
24  
25  
26  
27

1 8. Defendants are proceeding *pro se* since the withdrawal of their attorney prior to the  
2 judgment in this matter. Their last know contact information is as follows:

3 Jung Jin Corporation  
4 P.O. Box 503428  
5 Saipan, MP 96950  
(670) 235-4321

Park Hwa Sun  
P.O. Box 503428  
Saipan, MP 96950  
(670) 235-4321

6 Asia Enterprises Inc.  
7 P.O. Box 503448  
Saipan, MP 96950  
(670) 235-4321

Kim Hang Kwon  
P.O. Box 503448  
Saipan, MP 96950  
(670) 235-4321

8 9. The above-listed defendants have received notice by certified mail of all prior filings in  
9 these post-judgment proceedings, and will receive a copy of this motion and the application to sell  
10 Defendants' poker machines and poker related equipment certified mail, return receipt requested  
11 to the above-listed addresses.

12  
13 WHEREFORE, for the foregoing reasons, Plaintiffs waive any hearing on their application  
14 and this motion and respectfully request that the Court grant Plaintiffs' Application for a Third  
15 Order in Aid of Judgment as soon hereafter as the Court will allow.

16  
17 Respectfully submitted this 14<sup>th</sup> day of May, 2007.

18  
19 /s/ Mark B. Hanson

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25 Attorney for Plaintiffs  
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